

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Fond Du Lac Bumper Exchange, Inc., and
Roberts Wholesale Body Parts, Inc., on Behalf of
Themselves and Others Similarly Situated,

Plaintiffs,

v.

Jui Li Enterprise Company, Ltd., *et al.*,

Defendants.

Case No. 2:09-cv-00852-LA

Consolidated with:

Fireman's Fund Insurance Company, on
behalf of itself and all others similarly situated,

Plaintiff,

v.

Jui Li Enterprise Company, Ltd., *et al.*,

Defendants.

Case No. 2:13-cv-00987-LA

National Trucking Financial Reclamation Services,
LLC, individually and on behalf of itself and all others
similarly situated,

Plaintiff,

v.

Jui Li Enterprise Company Ltd., *et al.*,

Defendants.

Case No. 2:14-cv-1061-LA

**REPRESENTATIVE PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
AGREEMENT WITH AP AUTO PARTS INDUSTRIAL, LTD.
AND CORNERSTONE AUTO PARTS LLC**

PLEASE TAKE NOTICE that Fireman’s Fund Insurance Company and National Trucking Financial Reclamation Services, LLC (“Representative Plaintiffs”), individually and on behalf of the Settlement Class (as defined in the Settlement Agreement¹), by and through undersigned counsel, move this Court for entry of an Order: (1) granting preliminary approval of the Settlement Agreement with AP Auto Parts Industrial, Ltd. and Cornerstone Auto Parts LLC; (2) certifying the Settlement Class as defined in the Settlement; (3) appointing Fireman’s Fund Insurance Company and National Trucking Financial Reclamation Services, LLC, as Representative Plaintiffs; (4) appointing Ben Barnow, Barnow and Associates, P.C., Michael L. Roberts, Roberts Law Firm, P.A., Peter Crema, Cozen O’Connor, Daniel R. Karon, Karon LLC, and Derek G. Howard, Howard Law Firm, as Co-Lead Settlement Class Counsel; (5) approving the proposed Notice to the Settlement Class and the methods for dissemination of Notice set forth in the Notice Program;² (6) appointing Kurtzman Carson Consultants LLC (“KCC”) as Notice Specialist and Claims Administrator; (7) approving the Postcard Notice attached as Exhibit 1 to the Declaration of Carla A. Peak on Settlement Notice Plan and Notice Documents; and (8) scheduling a Final Fairness Hearing to consider entry of a final order approving the Settlement and the request for Representative Plaintiff incentive awards.

This Motion is made on the grounds that the Settlement is within the range of possible approval sufficient to justify sending notice of the Settlement to the Settlement Class and holding a hearing to determine whether the Court should grant final approval of the Settlement.

¹ A copy of the Settlement Agreement is attached as Exhibit A to the Declaration of Michael L. Roberts, filed herewith.

² The Notice Program is set forth in the Declaration of Carla A. Peak on Settlement Notice Plan and Notice Documents, which is attached as Exhibit B to the Declaration of Michael L. Roberts.

This Motion is based on the Memorandum in Support of Representative Plaintiffs' Motion for Preliminary Approval of Class Action Settlement Agreement with AP Auto Parts Industrial, Ltd. and Cornerstone Auto Parts LLC.; the Declaration of Michael L. Roberts and all exhibits attached thereto (including the Declaration of Carla A. Peak on Settlement Notice Plan and Notice Documents); and any documentary evidence that may be presented at hearing on this Motion.

Dated: September 23, 2019

Respectfully submitted,

s/ Michael L. Roberts

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Proposed Co-Lead Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2019, I caused a true and correct copy of the foregoing document to be served upon counsel of record via the Court's ECF filing system.

/s Michael L. Roberts

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